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11 12	Attorneys for Plaintiff ELAN MICROELECTRONICS CORPORATION	1	
13			
14	UNITED STATES DISTRICT COURT DISTRICT OF NEVADA		
15			
16	ELAN MICROELECTRONICS	Case No. 2:10-cv-00014-GMN-(PAL)	
17	CORPORATION,	ELAN MICROELECTRONICS	
18	Plaintiff,	CORPORATION'S MOTION TO FILE UNDER SEAL EXHIBIT 4 TO THE	
19	v.	DECLARATION OF SEAN P. DEBRUINE IN SUPPORT OF ELAN'S	
20	PIXCIR MICROELECTRONICS CO. LTD.,	REPLY IN SUPPORT OF MOTION FOR SANCTIONS FOR FAILURE TO	
21	Defendant.	PROVIDE DISCOVERY	
22			
23	Pursuant to Local Rule 10-5(b) and the Court's Protective Order dated September 22, 2011		
24	[Doc. 40], Plaintiff Elan Microelectronics Corporation ("Elan") hereby requests leave of Court to		
25	file under seal the following document, which will be filed contemporaneously herewith:		
26	1. Exhibit 4 to the Declaration of Sean P. DeBruine in Support of Elan's Reply in		
27	Support of Motion for Sanctions for Failure to Provide Discovery.		
28	As grounds for this motion, Elan states that Exhibit 4 is designated by Defendant Pixcir		
	ELAN'S MOTION TO SEAL	Case No. 2:10-cv-00014 GMN-(PA	
	II		

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1	Microelectronics Co. Ltd. as "Confidential – Attorney Eyes Only" pursuant to the Stipulated		
2	Protective Order in this matter.		
3	Pursuant to Local Rule 10-5(b), Elan will file the above-referenced paper under seal with		
4	the requisite notation: "FILED UNDER SEAL PURSUANT TO COURT ORDER DATED		
5	SEPTEMBER 22, 2011."		
6	DATED: November 28, 2011 Resp	ectfully submitted,	
7	7		
8	3		
9		/s/ Sean P. DeBruine Robert J. Caldwell, Esq. (Nevada Bar No. 7637)	
10	ן (Matthew J. Christian, Esq. (Nevada Bar No. 8024) KOLESAR & LEATHAM, CHTD.	
11	1	100 South Rampart Boulevard, Suite 400	
12	2	Las Vegas, Nevada 89145	
13	·	and De De Province For	
14	Ť	Sean P. DeBruine, Esq. Admitted <i>Pro Hac Vice</i> ALSTON & BIRD LLP	
15	2	275 Middlefield Road, Suite 150 Menlo Park, California 94025	
16		Attorneys for Plaintiff	
17	′	ELAN MICROELECTRONICS CORPORATION	
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	·	O N 2-10 00014 CND (DAL)	

CERTIFICATE OF SERVICE 1 I hereby certify that I am an Employee of Alston & Bird LLP, and that on the 28th day of 2 November, 2011, I served a true and correct copy of foregoing ELAN MICROELECTRONICS 3 CORPORATION'S MOTION TO FILE UNDER SEAL EXHIBIT 4 TO THE 4 DECLARATION OF SEAN P. DEBRUINE IN SUPPORT OF ELAN'S REPLY IN 5 SUPPORT OF MOTION FOR SANCTIONS FOR FAILURE TO PROVIDE DISCOVERY 6 AND [PROPOSED] ORDER in one or more of the following manners: 7 8 (ELECTRONIC SERVICE) Pursuant to FRCP 5(b)(3) and LR 5-4, the above-referenced 9 document was electronically filed and served upon the parties listed below through the Court's 10 Case Management and Electronic Case Filing (CM/ECF) system: 11 (FACSIMILE) by sending a copy of the above-referenced document by facsimile to the 12 parties at the facsimile numbers listed below; and 13 (EMAIL) by forwarding a scanned copy of the above-referenced document by email to the 14 parties at the email addresses listed below: 15 Kenneth D'Alessandro, Esq. Robert E. Krebs, Esq. 16 W. West Allen, Esq. Ronald F. Lopez, Esq. Christopher L. Ogden, Esq. Lewis and Roca, LLP 3993 Howard Hughes Parkway 17 Awaiting Pro Hac Vice Applications Nixon Peabody LLP Suite 600 18 2 Palo Alto Square, 3000 El Camino Real, Las Vegas, Nevada 89169 Suite 500 19 Facsimile: (702) 949-8365 Palo Alto, California 94306-2106 20 Facsimile: (650) 320-7701 Email: kdalessandro@lrlaw.com 21 wallen@lrlaw.com Email: rkrebs@nixonpeabody.com 22 rflopez@nixonpeabody.com Attorneys for Defendant, cogden@nixonpeabody.com Pixcir Microelectronics Corporation 23 Attorneys for Defendant, 24 Pixcir Microelectronics Corporation 25 26 2.7 Employee, Alston & Bird LLP 28

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12	Attorneys for Plaintiff ELAN MICROELECTRONICS CORPORATIO	N
13	UNITED STATES	DISTRICT COURT
14		OF NEVADA
15	DISTRICT	JI NEVADA
16	ELAN MICROELECTRONICS	Case No. 2:10-cv-00014-GMN-(PAL)
17	CORPORATION,	[PROPOSED] ORDER GRANTING
18	Plaintiff,	ELAN MICROELECTRONICS CORPORATION'S MOTION TO FILE
19	V.	UNDER SEAL
20	PIXCIR MICROELECTRONICS CO. LTD.,	
21	Defendant.	
22		
23		
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25		
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_0		
	[PROPOSED] ORDER GRANTING ELAN'S MOTION TO SEAL	Case No. 2:10-cv-00014 GMN-(PAI

The Court has received plaintiff Elan Microelectronics Corporation's Motion to File Under 1 Seal, filed on November 28, 2011. Good cause appearing, Elan's motion is hereby GRANTED. It 2 3 is hereby ORDERED that the following documents may be filed under seal: 1. Exhibit 4 to the Declaration of Sean P. DeBruine in Support of Elan 4 Microelectronics Corporation's Reply in Support of Motion for Sanctions for Failure to Provide 5 Discovery. 6 7 IT IS SO ORDERED this 4; yi day of 'P qxgo dgt.'2011. 8 9 10 11 United States Oci kutcyg'Judge 12 Respectfully submitted, 13 14 15 /s/ Sean P. DeBruine By: 16 Robert J. Caldwell, Esq. Nevada Bar No. 7637 17 KOLESAR & LEATHAM, CHTD. Matthew J. Christian, Esq. 18 Nevada Bar No. 8024 400 South Rampart Boulevard, Suite 400 19 Las Vegas, Nevada 89145 20 and 21 Sean P. DeBruine, Esq. Admitted Pro Hac Vice 22 **ALSTON & BIRD, LLP** 275 Middlefield Road, Suite 150 23 Menlo Park, California 94025 24 Attorneys for Plaintiff ELAN MICROELECTRONICS CORPORATION 25 26 27 28 [PROPOSED] ORDER GRANTING ELAN'S MOTION TO Case No. 2:10-cv-00014 GMN-(PAL)

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SEAL

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